THE OFFICE OF REGULATORY STAFF DIRECT TESTIMONY & EXHIBITS

OF

WILLIE J. MORGAN, P.E.

APRIL 14, 2015



DOCKET NO. 2014-406-S

Application of Development Service, Incorporated for Approval of Sewer Rates, Terms and Conditions

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1		DIRECT TESTIMONY OF WILLIE J. MORGAN, P.E.
2		ON BEHALF OF
3		THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
4		DOCKET NO. 2014-406-S
5		IN RE: APPLICATION OF DEVELOPMENT SERVICE, INCORPORATED
6		FOR APPROVAL OF SEWER RATES, TERMS AND CONDITIONS
7		
8	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.
9	A.	My name is Willie J. Morgan, and my business address is 1401 Main Street, Suite
10		900, Columbia, South Carolina 29201. I am employed by the South Carolina Office of
11		Regulatory Staff ("ORS") as the Program Manager for the Water and Wastewater
12		Department.
13	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.
14	A.	I received a Bachelor of Science Degree in Engineering from the University of
15		South Carolina in 1985 and a Master of Arts Degree in Management from Webster
16		University in 2000. I am a licensed Professional Engineer registered in the State of South
17		Carolina.
18	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?
19	A.	The purpose of my testimony is to set forth the ORS staff findings relative to my
20		review of the rate increase application submitted by Development Service, Incorporated
21		("DSI"). Specifically, I will focus on DSI's compliance with the Public Service
22		Commission of South Carolina ("Commission" or "PSC") rules and regulations, ORS's

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1		Business Compliance Review of DSI's wastewater system, test-year revenue and
2		proposed revenue, and performance bond requirement.
3	Q.	ARE THE FINDINGS OF YOUR REVIEW CONTAINED IN THIS TESTIMONY
4		AND ACCOMPANYING EXHIBITS?
5	A.	Yes, my testimony and the attached exhibits detail ORS's findings and
6		recommendations.
7	Q.	PLEASE EXPLAIN HOW YOU COMPILED INFORMATION FOR YOUR
8		TESTIMONY AND EXHIBITS.
9	A.	I utilized ORS's Business Office Compliance Review results, information
10		provided by DSI in its application and additional information provided by DSI during the
11		course of our business review and facility site inspections. I also reviewed DSI's
12		financial statements and performance bond documents submitted to the Commission.
13	Q.	PLEASE PROVIDE AN OVERVIEW OF THE LOCATIONS, SERVICE TYPES
14		AND CUSTOMER BASE SERVED BY DSI.
15	A.	DSI is a public utility providing wastewater collection and treatment service in
16		portions of Lexington and Richland Counties. DSI is currently a National Association of
17		Regulatory Utility Commissioners ("NARUC") Class B wastewater utility according to
18		wastewater revenues reported on its application for the test year ending December 31,
19		2013. According to DSI's Application, wastewater collection and treatment services
20		were provided to 191 residential and commercial customers.
21	Q.	PLEASE EXPLAIN EXHIBIT WJM-1.

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1	A.	Exhibit WJM-1 provides a summary of the Business Office Compliance Review
2		completed by ORS and a summary of the wastewater collection/treatment system
3		inspected by ORS on February 24, 2015. DSI is in compliance with the Annual Report
4		and Gross Receipts requirements.
5		DSI appears to be responsive to DHEC and federal environmental requirements
6		which are applicable to the operation of its wastewater collection and treatment system.
7	Q.	DOES ORS RECOMMEND ANY ADJUSTMENTS TO THE TEST YEAR
8		REVENUES OF DSI?
9	Α.	Yes. ORS completed a comprehensive review of DSI's customer wastewater
10		revenue calculations for the test year. Based on that review, ORS made revenue
11		adjustments totaling \$26,060. These adjustments are shown on Audit Exhibit ICG-1,
12		sponsored by ORS witness Ivana C. Gearheart. These revenue adjustments were made in
13		order to normalize customer billing. ORS imputed test year revenue based on customer
14		billing information provided in the original Application and supplemental customer
15		billing data provided by DSI.
16	Q.	EXPLAIN THE TEST YEAR REVENUE CALCULATED BY ORS FOR DSI.
17	A.	Commission approved rates were applied in ORS's revenue calculation to all
18		customers. ORS completed a review of DSI's customer wastewater revenue calculations
19		for the test year. Exhibit WJM-2 summarizes DSI's service revenues for the test year
20		ending December 31, 2013. ORS used DSI's current and proposed rates as reflected in

the Application for each calculation. ORS calculated test year revenue based on

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1		customer billing information provided in the Application, information from site visits,
2		and supplemental data provided by DSI.
3		In summary, ORS calculated test year operating revenues for residential and
4		commercial wastewater operations, as adjusted, of \$553,640. For comparison purposes,
5		ORS calculated DSI's proposed residential and commercial wastewater operating
6		revenues, as adjusted, of \$839,786. ORS did not factor customer growth into its revenue
7		comparisons.
8	Q.	EXPLAIN THE LATE FEES IN THE OTHER WASTEWATER REVENUE
9		CATEGORY ON EXHIBIT WJM-2.
10	A.	ORS proposes an adjustment to Late Fees revenue of \$1,535 to synchronize Late
11		Fees revenue to the proposed rates. This adjustment is reflected in ORS Audit Exhibit
12		ICG-1 provided by ORS witness Ivana C. Gearheart.
13	Q.	PLEASE EXPLAIN EXHIBIT WJM-3 OF YOUR REPORT.
14	A.	Exhibit WJM-3 is a comparison of DSI's current PSC approved rates and
15		proposed rates.
16	Q.	PLEASE EXPLAIN THE STATUS OF THE PERFORMANCE BOND FOR DSI.
17	A.	DSI has a current performance bond for utility operations in the form of a
18		Personal Financial Statement on file with the PSC in the amount of \$100,000. Based on
19		the expenses from the test year and using the criteria set forth in 10 S.C. Code Ann. Regs.
20		103-512.3.1 (2012), ORS recommends that the face amount of DSI's bond be increased
21		to \$350,000 for wastewater operations (Exhibit WJM-4). DSI's adjusted bonding criteria
22		expenses for the test year were \$454,525 for wastewater operations. ORS respectfully

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requests that the Commission increase DSI's bond amount to \$350,000 as it is in the public interest for DSI to obtain a bond that satisfies the criteria set forth in S.C. Code Ann. Section 58-5-720 (Supp. 2014).

4 Q. PLEASE EXPLAIN EXHIBIT WJM-5.

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A. Exhibit WJM-5 demonstrates the effect of the proposed rate increase on DSI's ten highest billed customers. Their individual monthly service bills range from \$693.07 per month to \$8,823.36 per month under currently approved rates. At the rates proposed by DSI, their monthly service bills would range from \$1,070.72 per month to \$13,624.80 per month.

10 Q. WHAT OPERATING MARGIN DOES ORS RECOMMEND FOR DSI IN THIS 11 RATE CASE?

Using ORS' proposed adjustments for the test year ending December 31, 2013, the Operating Margin computed by ORS for DSI is 0.40%. DSI's proposed increase, with ORS proposed adjustments, would generate an operating margin of 20.87%. ORS recommends an operating margin range of 10-15% which will provide a prudent balance between the consumer's need for affordable, quality services and DSI's financial health. It is the position of ORS that this operating margin range, as recommended, is fair and reasonable and balances the overall public interest.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20 A. Yes it does.



ORS BUSINESS OFFICE COMPLIANCE REVIEW

Utility:

Development Service, Inc.

Inspector:

Willie Morgan, Hannah Majewski,

Office:

816 Main St., Lexington SC

Utility Type:

Wastewater

Date: 2-24-15

Company Representative: Keith Parnell, Blythe Larned

#	Compliance Regulation	In Compliance	Out of Compliance	Comments
1	All records and reports available for examination in accordance with R.103-510.	x		
2	Complaint records maintained in accordance with R.103-516	х		
3	Utility's rates, its rules and regulations, and its up-to-date maps and plans available for public inspection in accordance with R.103-530.	x		
4	Established procedures to assure that every customer making a complaint is made aware that the utility is under the jurisdiction of the South Carolina Public Service Commission and that the customer has the right to register the complaint in accordance with R.103-530.	x		
5	Deposits charged within the limits established by R.103-531.	х		No deposits charged
6	Timely and accurate bills being rendered to customers in accordance with R.103-532.	x		Bills rendered the 25 th of each month
7	Bill forms in accordance with R.103-532.	Х		
8	Adjustments of bills handled in accordance with R.103-533	x		DSI charged customers a fee for the notice sent via certified mail. This is not a PSC approved charge. DSI has credited or returned the certified letter fees charged to customers.
9	Policy for customer denial or discontinuance of service in accordance with R.103-535.	x		to customers.
10	Notices sent to customers prior to termination in accordance with R.103-535.	х		
11	Notices filed with the Commission of any violation of PSC or DHEC rules which affect service provided to its customers in accordance with R.103-514-C.	x		

Exhibit WJM-1

#	Compliance Regulation	In Compliance	Out of Compliance	Comments
12	Utility has adequate means (telephone, etc.) whereby each customer can contact the water and/or wastewater utility at all hours in case of emergency or unscheduled interruptions or service in accordance with R.103-530.	x		
13	Records maintained of any condition resulting in any interruption of service affecting its entire system or major division, including a statement of time, duration, and cause of such an interruption in accordance with R.103-514.	x		
14	Utility advised the Commission, in accordance with Rule 103-512 of the name, title, address and telephone number of the person who should be contacted in connection with general management duties, customer relations, engineering operations, and emergencies during non-office hours.	x		
15	Company verified the maps on file with the Commission include all the service area of the company.	x		
16	Number of customers the company has at present time.			191
17	Company has a current performance bond on file with the Commission. Amount of bond: \$100,000	x		ORS recommends that the performance bond amount be increased to \$350,000.
18	Utility maintains a documented Safety Program.	x		
19	Utility maintains a documented Emergency Response plan.	х		
20	Utility maintains a documented Preventative Maintenance plan.	х		
21	Utility submitted a current Annual Report.	Х		
22	Utility is in compliance with Gross Receipts reporting and payment regulations.	х		



ORS WASTEWATER SYSTEM INSPECTION REPORT

Inspection Overview

Date Inspected: 2-24-2015

Inspector Name: Willie Morgan, Hannah Majewski

Docket Number: 2014-406-S

Utility Name:Development Service, Inc.Utility Representative:Keith Parnell, Blythe Larned

Number of Customers: 193

System Type (collection, force main, lagoon, etc): Collection and treatment

Location of System: Lexington Co.

Location of Utility Office: 816 Main St., Lexington SC

Treatment Type: Sequential Batch Reactor and Belt Press for Sludge Management

Permit #: SC0032743
Last SC DHEC Compliance Rating: Satisfactory

Frequency checked by WWTF Operator: Daily

Drinking Water Provider: City of Columbia

Inspection Results

	System Components Inspected	Comp	liance	Comments
		Yes	No	
1	Chlorinator	NA	NA	Uses UV for disinfection
2	Other chemicals in use	Х		
3	Aerators present	NA	NA	None
4	Plant fenced and locked	Х		
5	Warning Signs Visible	Х		
6	Fence in good condition	Х		
7	Dikes in good condition	NA	NA	Treatment and storage in tanks
8	Odor non-existent or limited	Х		
9	Grass mowed	Х		
10	Duckweed/Algae acceptable	Х		
11	Grease build-up acceptable	Х		
12	Plant free of debris	Х		
13	Effluent Color acceptable	Х		
14	Lift Stations present	Х		1 at WWTP
15	Failure Warning System adequate	Х		
16	Electric Wiring adequate	Х	ĺ	
17	System free of leaks	Х		
18	System free of overflows	Х		
19	Access road adequate	Х		
20	Ability for service area to expand	NA	NA	None

Additional Comments: DSI provides wastewater treatment services to the Town of Ridgeway and other commercial customers. This wastewater is delivered to the WWTP using tanker trucks.

Development Service, Inc. Test Year Revenues at Current Rates Equivalent Residential Fee per					
Туре	Classification	Connection ("ERC" or "SFE") Units	Unit	Calculated Revenues	
	Residential	108.00	\$26,48	\$34,318	
	Apartments	514.00	\$25.15	\$155,125	
	TOTAL Residential	622.00		\$189,443	
	Commercial				
	Service Station				
	1st bay, per bay	11.00	\$41,16	\$5,433	
	Additional bay	23.00	\$20,58	\$5,680	
	Without bay Food Service Operations		\$28,92	\$0	
	Ordinary/seat (not 24 hrs)	2,358.00	\$4.12	\$116,580	
	24 hour restaurant/seat	34.00	\$6.16	\$2,513	
	Drive-in/car space	34.00	\$4.12	\$0	
	Fast-food/car space	4,26	\$4.12	\$0	
	Vending Machine	148.00	\$2.46	\$4,369	
	Churches	1			
	Church per Seat <132 seats	1.00	\$26.48	\$318	
	Church per seat >132 seats	4,290.00	\$0.20	\$10,296	
	Minimum monthly charge	91.14	\$26.48	\$28,961	
	Car Washes				
	Car wash per car	220.00	\$4.18	\$11,035	
S	Offices				
	Per person (no restaurant)	1,615.00	\$1,03	\$19,961	
E	Nursing/Rest Homes Per bed (no laundry)	515-9	* 2.50	***	
	Per bed (no laundry) Per bed (with laundry)	(2)	\$3.50	\$0	
W	Schools	3.50	\$4,12	\$0	
	Per student, no showers, gym, cafeteria	331.00	\$0.82	\$3,257	
Ε	Per student, with cafeteria, no gym, showers	331.00	\$1.03	\$0	
R	Per student with cafeteria, gym, showers	-	\$1.24	\$0	
N	Shopping Centers	1			
	Per 1,000 sq. ft. space	665,46	\$8.24	\$65,801	
	Swimming Pools				
	Per person with facilities	362,00	\$0,82	\$3,562	
	Theaters				
	Indoor/seat	2,880.00	\$0.44	\$15,206	
	Drive-in/stall	127	\$0.44	\$0	
	Picnic Parks	-		2000	
	Average attendance		\$1.24	\$0	
	Institutions Per resident	_	\$3.50	to.	
	Laundries		\$3.5U	\$0	
	Self Serve (per machine)	18.00	\$14.00	\$3,024	
	Mobile Homes	1 25.00	42,100	40,027	
	Per person		\$3.50	\$0	
	Motels				
	Per unit (no restaurant)	885.00	\$3.50	\$37,170	
	Factories				
	Each employee, no showers	¥	\$1.24	\$ 0	
	Each employee, with showers		\$1.63	\$ 0	
	Each employee w/ kitchen facilities		\$2.04	\$0	
	TOTAL Commercial	13,932.60		\$333,166	
		AL SEWER SERVICE	REVENUE	\$522,609	
	r Revenues - Commercial			\$1,126 \$12,240	
ther Sewer Revenues - Public Authorities (Town of Ridgeway) ther Sewer Revenues - Midlands (Raintree/Dutchcreek) WWTP					
ther Sewer Revenues - Midlands (Raintree/Dutchcreek) WW1P ther Sewer Revenues - Disconnect Fees					
ther Sewer Revenues - Late Fees					
ther Sewer Revenues - Late Fees ther Sewer Revenues - Customer Account Charge, MCEC, and Tap Fees (non-CIAC)					
		TAL Miscellaneous	Revenues	\$2,571 \$31,031	
		OTAL OPERATING		\$553,640	
		v. alville		4000,040	

Development Service, Inc. Test Year Revenues at Proposed Rates

	ment Service, Inc. Test Year Revenues at Prop	Equivalent		-	1	т —
		Residential		Test Year	Increased	%
Service	Classification	Connection	Fee per			
Type	Classification	("ERC" or	Unit	Proposed	Amount	Increase
		"SFE") Units	1	Revenues		Ì
	Residential	108.00	\$40.90	\$53,006	\$18,688	54.5%
	Apartments	514.00	\$38.84		\$84,440	
	TOTAL Residential	+	\$30.04	\$239,565		54.4%
	IOTAL Residential	622.00	— —	\$292,571	\$103,128	54.4%
		ļ				
	Commercial		ļ	ļ. <u>.</u>	<u> </u>	
	Service Station		ļ			<u> </u>
	1st bay, per bay	11.00	\$63.57	\$8,391	\$2,958	54.4%
	Additional bay	23.00	\$31.79	\$8,774	\$3,094	54.5%
	Without bay	-	\$44.67	\$0		
	Food Service Operations					
	Ordinary/seat (not 24 hrs)	2,358.00	\$6.36	\$179,963	\$63,383	54.4%
	24 hour restaurant/seat	34.00	\$9.51	\$3,880	\$1,367	54.4%
	Drive-in/car space	-	\$6.36	\$0	12,000	
	Fast-food/car space		\$6.36	\$0	 	
	Vending Machine	140.00	_		40.000	54.504
		148.00	\$3.80	\$6,749	\$2,380	54.5%
	Churches	 			ļ	<u> </u>
	Church per Seat <132 seats	1.00	\$40.90	\$491	\$173	54.4%
	Church per seat >132 seats	4,290.00	\$0.31	\$15,959	\$5,663	55.0%
	Minimum monthly charge	91.14	\$40.90	\$44,732	\$15,771	54.5%
	Car Washes					
	Car wash per car	220.00	\$6.46	\$17,054	\$6,019	54.5%
S	Offices					
3	Per person (no restaurant)	1,615.00	\$1.59	\$30,814	\$10,853	54.4%
E	Nursing/Rest Homes	1,015.00	42.55	\$50,014	\$10,055	37.770
-	Per bed (no laundry)		#E 41	to.		
w		· ·	\$5.41	\$0		
VV	Per bed (with laundry)	<u> </u>	\$6.36	\$0		
_	Schools					
Ε	Per student, no showers, gym, cafeteria	331.00	\$1.27	\$5,044	\$1,787	54.9%
_	Per student, with cafeteria, no gym, showers	-	\$1.59	\$0	L	
R	Per student with cafeteria, gym, showers		\$1.92	\$0		
ì	Shopping Centers					
	Per 1,000 sq. ft. space	665.46	\$12.73	\$101,656	\$35,855	54.5%
	Swimming Pools					
	Per person with facilities	362.00	\$1.27	\$5,517	\$1,955	54.9%
- 1	Theaters		4=:=:	4-1	V-7	0 11070
	Indoor/seat	2,880.00	\$0.68	\$23,501	\$8,295	54.6%
	Drive-in/stall	2,880.00	\$0.68		\$0,293	34.076
	Picnic Parks		\$0.06	\$0		
- 1					-	
- 1	Average attendance	-	\$1.92	\$0		
	Institutions					
ļ	Per resident	-	\$5.41	\$0		
l	Laundries]			
[Self Serve (per machine)	18.00	\$21.62	\$4,670	\$1,646	54.4%
[Mobile Homes					
ſ	Per person	-	\$5.41	\$0		
	Motels					-
	Per unit (no restaurant)	885.00	\$5.41	\$57,454	\$20,284	54.6%
-	Factories	003.00	40.71	4011101	420,204	24.070
	Each employee, no showers		f1.02	f 0		
			\$1.92	\$0		
	Each employee, with showers		\$2.52	\$0		
	Each employee w/ kitchen facilities		\$3.15	\$0		
	TOTAL Commercial	13,932.60		\$514,649	\$181,483	54.5%
	TOTAL	SEWER SERVICE	REVENUE	\$807,220	\$284,611	54.5%
	Revenues - Commercial			\$1,126	\$0	0.0%
ther Sewer	Revenues - Public Authorities (Town of Ridgeway)			\$12,240	\$0	0.0%
ther Sewer	Revenues - Midlands (Raintree/Dutchcreek) WWTP			\$12,240	\$0	0.0%
	Revenues - Disconnect Fees			\$35	\$0	0.0%
	Revenues - Late Fees		\$4,354	\$1,535	54.5%	
	Revenues - Customer Account Charge, MCEC, and Tap Fe		\$2,571	\$0	0.0%	
		Revenues		30	0.076	
		\rightarrow	\$32,566	***	P# ===	
	TO1	AL OPERATING	REVENUE	\$839,786	\$286,146	51.7%

Schedule of Proposed Rates and Charges For Development Service, Inc. Docket No. 2014-406-S

Schedule of Residential Rates	<u>Current</u>	Proposed
Type of Residence	# 00.40	A 40.00
Single Family	\$26.48	\$ 40.90
Apartments	\$25.15	\$ 38.84
Schedule of Commercial Rates		
Service Stations		
1 st Bay	\$41.16	\$ 63.57
Additional bay	\$20.58	\$ 31.79
Without bay	\$28.92	\$ 44.67
Food Service Operations		
Ordinary/seat (not 24 hrs)	\$ 4.12	\$ 6.36
24 Hour Restaurant/seat	\$ 6.16	\$ 9.51
Drive-In/car space	\$ 4.12	\$ 6.36
Fast Food/car space	\$ 4.12	\$ 6.36
Vending Machine	\$ 2.46	\$ 3.80
G	¥ =:	, 0.00
Churches		
Church per seat, <132 seats	\$26.48	\$ 40.90
Church/seat, >132 seats	\$ 0.20	\$ 0.31
Minimum Monthly Charge	\$26.48	\$ 40.90
Car Washes		
Car Wash (per car)	\$ 4.18	\$ 6.46
Offices		
Offices	¢ 4.02	ф 4 г о
Per person/no restaurant	\$ 1.03	\$ 1.59
Nursing/Rest Homes		
Per Bed (no laundry)	\$ 3.50	\$ 5.41
Per Bed (with laundry)	\$ 4.12	\$ 6.36
· · · Dou (man aunany)	Ų 11.12	Ψ 0.00
Schools		
Per student, no showers, Gym,		
cafeteria	\$ 0.82	\$ 1.27
Per student, w/cafeteria, no gym,		
showers	\$ 1.03	\$ 1.59
Per student, with cafeteria, Gym,	·	
Showers	\$ 1.24	\$ 1.92

Shopping Centers Per 1,000 sq. ft. space	\$ 8.24	\$	12.73
Swimming Pools Per person with facilities	\$ 0.82	\$	1.27
Theaters Indoor/seat Drive-in/Stall	\$ 0.44 \$ 0.44	\$ \$	0.68 0.68
Picnic Parks Average attendance	\$ 1.24	\$	1.92
Institutions Per resident	\$ 3.50	\$	5.41
Laundries Self Serve (per machine)	\$ 14.00	\$	21.62
Mobile Homes Per person	\$ 3.50	\$	5.41
Motels Per unit (no restaurant)	\$ 3.50	\$	5.41
Factories Each employee no showers Each employee w/ showers Each employee w/ kitchen facilities	\$ 1.24 \$ 1.63 \$ 2.04	\$ \$ \$	1.92 2.52 3.15

Schedule of Tap Fees

The "Water Pollution Control Division Guidelines for Unit Contributory Loadings of Wastewater Treatment Facilities (1990)" are incorporated herein by reference. To determine tap fees the following formula is used if the customers' Bio-Chemical Oxygen Demand (BOD) factor is greater than the BOD factor for a resident:

$$\frac{\textit{Total Volume (gpd)}}{400 \, (\textit{gpd})} \times \frac{\textit{Unit BOD of Customer/100gal}}{0.17 \, \textit{lbs}.} \times \$350.00$$

If the customer's BOD factor is less than the BOD factor of an equal volume of residential waste, the following formula should be used:

$$\frac{Total\ Volume\ (gpd)}{400\ (gpd)}\times\$350.00$$

Development Service, Inc. Docket No. 2014-406-S Performance Bond

		DSI - Wastewater				
Bond Value Components	Application Per Books	After Accounting & Pro Forma Adjustments	After Proposed Increase			
Sewer Operation and Maintenace Expenses	\$393,454	\$356,704	\$364,118			
Taxes Other Than Income -Property tax	\$3,699	\$43,107	\$43,107			
Taxes Other Than Income - Payroll tax	\$13,198	\$10,746	\$10,746			
Taxes Other Than Income - SCPSC Asses	\$3,633	\$5,157	\$7,823			
Income Tax - State Income Tax	\$0	\$175	\$13,979			
Income Tax - Federal Income Tax	\$0	\$1,132	\$90,301			
Interest Expense	\$43,170	\$37,504	\$37,504			
Bond Value Requirement	\$457,154	\$454,525	\$567,578			
Current Performance Bond Structure	Bood Volume					
	Bond Value	Expiration Date				
Personal Financial Statement	\$100,000	03/05/16				
Total Financial Assurance	\$100,000					

Development Service, Inc. Docket No. 2014-406-S Highest Top 10 Billed Customers

<u>Customer Name</u>	Service Address	<u>Customer</u>	Service	ERC or SFE	Current Fee per unit	Proposed Fee per unit	Monthly Charge at Current Rate	Monthly Charge at Proposed Rate
1 BRIARGATE APARTMENTS	825 MENLO DRIVE	Commercial	СВ	336.00	1.11	1.71	\$372.96	\$574.56
		Commercial	UNIT	336.00	25.15	38.84	\$8,450.40	\$13,050.24
					il in		\$8,823.36	\$13,624.80
2 PHILLIPS EDISON & CO.	DUTCH SQUARE MALL	Commercial	RS	862.00	4.12	6.36	\$3,551.44	\$5,482.32
		Commercial	SQ FT	275.00	8.24	12.73	\$2,266.00	\$3,500.75
							\$5,817.44	\$8,983.07
3 LEXINGTON GREEN HOA	1200 DUCH DUCH DO AD	Io 11	****					HILLIAN IVE
JEZINGTON GREEN HOA	1208 BUSH RIVER ROAD	Commercial	UNIT	166.00	25.15	38.84	\$4,174.90	\$6,447.44
4 WALMART	1326 BUSH RIVER RD	Commercial	SQ FT	203.57	8.24	12.73	\$1,677.44	\$2,591.48
		Commercial	RS	44.00	4.12	6.36	\$181.28	\$279.84
							\$1,858.72	\$2,871.32
5 AMC MAIL STOP #4	DUTCH SQUARE 14 08980	Commercial	TS	2880.00	0.44	0.68	\$1,267.20	\$1,958.40
6 WATERFORD PLACE HOA	BUSH RIVER RD	Commercial	EA	43.00	26.48	40.90	\$1,138.64	\$1,758.70
7 DUTCH CENTER ASSOC, LLC	810 DUTCH SOUADE REVE	D. Commercial	PE	225.00	1.03	1.50	\$231.75	\$357.75
	OTO DETENT SQUARE BEVE	Commercial	PS	23.00	0.82	1.59	\$18.86	\$29.21
		Commercial	SF	101.66	8.24	12.73	\$837.68	\$1,294.13
			<u> </u>	101.00	3.24	12.75	\$1,088.29	\$1,681.09
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8 WELLS FARGO BANK	ADMIN GREYSTONE	Commercial	PE	550.00	1.03	1.59	\$566.50	\$874.50
		Commercial	VR	148.00	2.46	3.80	\$364.08	\$562.40
							\$930.58	\$1,436.90
9 BAYMONT INN & SUITES	347 ZIMALCREST DRIVE	Commercial	POOL	149.00	0.82	1.27	\$122.18	\$189.23
		Commercial	PR	149.00	3.50	5.41	\$521.50	\$806.09
		Commercial	RS	45.00	4.12	6.36	\$185.40	\$286.20
		Commercial	WM	2.00	14.00	21.62	\$28.00	\$43.24
		Commercial	WM	2.00	14.00	21.62	\$28.00 \$857.08	\$43.24 \$1,324.76